

before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

Petition for Rule Making

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In the Matter Of:

Changes to the basic structure of the license
procedures and grades for the Amateur
Radio Service, including reduction in number of
License classes, changes to call sign
assignments, changes in exam procedures and
administrations, reduction of FCC administration costs,
expansion of reliance on VEC's.

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Summary of topics

This petition proposes to reduce the number of license classes to three. It proposes that these classes of license be called Explorer, Adventurer and Expert. It proposes to grandfather all existing licensees' privileges, to allow a phase in of the new licenses and privileges, it proposes allowing those holding a current amateur radio service license to either continue their present class and privileges or to adopt through meeting the criteria listed for each, a new license class and privilege set. This petition proposes the continuation of the Volunteer Examination system so as to not add to the Commission's administrative burden.

Basis for changes

It has long been held by a great many hams and non hams that the Incentive Licensing structure initiated by the ARRL and implemented in the rules more than three decades ago, has not achieved its intended purpose, and is often blamed for the demise of manufacturers, and electronic stores from the outflows of hams and the failure to attract new hams. The system depends on the individual passing a series of exams in order to attain higher class license and more extensive operating privileges. The system also failed to recognize at the time of implementation, the license status and privileges of existing license holders, and removed privileges from certain license classes, sparking ire and debate which lasts to this day.

The Commission currently issues licenses based upon examination. These exams serve as a gateway and include questions for which the individual cannot have prior experience to gain the knowledge, but must rely on Q&A license books and classes. The use of memorizable Q&A books such as those published by the ARRL, Bash, Ameco, and others created controversy and debate. Later other learning aids were published which provided text presentations to teach actual theory of operation, rules and technical topics. However, the exams can still be passed by simple rote memorization of Q & A guides.

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The Incentive Licensing system was also supposed to encourage the individual to achieve a higher class of license. When the number of individuals attempting to upgrade was disappointing, additional incentives were added, to wit: "better" call signs (ie a 2 x 2 vs a 2 x 3) vanity calls signs (for Extra class or for those with 25 years or more)

The fatal flaw in this system is that the individual has little direct knowledge of what the additional privileges may offer since the individual is prohibited from operating certain modes, and certain bands until the effort to learn from class and exam stage is passed. There is also lack of value to each level of the license structure since each level can be accomplished by only passing an exam of rote knowledge and makes no effort to encourage operation and learn by doing, which would add intrinsic value. I would characterize this as telling a person that strawberries and asparagus are both equally delicious, but that they cannot have either until they first pass an exam on fruits and vegetables, and the exam only covers the biological necessities to grow them. The value of the goal is unknown, and therefore the value of the effort to pass the test is unknown. Until you taste strawberries and asparagus you can't judge the value and personal desire to have more.

Further, although there has been an influx in new license holders, few of these are expanding their horizons into other areas of ham radio, ie "upgrading" in order to become more proficient and knowledgeable. Indeed it might be a correct stereotype to say that we have created a handy-talkie generation that has little interest (incentive) to go beyond the use of the local narrowband FM repeater usage to discover the many other areas which offer fun, rewarding experiences, personal growth and achievements.

The basis for the proposed license system is experience and achievement. Only an initial written exam is required, although a written exam in certain areas is retained, it is replaced in most part by technical knowledge and operating experience with some credit for continuing education. The incentives are expanded privilege and call signs of choice but with the added value that the license and call sign stand for actual ACHIEVEMENT, not memorization of a Q&A book. The exam portion would only cover those areas where experience cannot be easily obtained, such as electrical and RF safety, in order to minimize the risk of dealing with these every day hazards. If the saying, "Experience is the best teacher" is true, then we need to encourage experience. This is done through encouragement of operating and building, and related means to achieve the goals of the basis and purpose of amateur radio, to provide a pool of technically competent individuals, to encourage education and good operating skills.

License Specifics

The Explorer class license

The purpose of this license is to allow the individual sufficient operating privileges that they can get a sampling of nearly all areas of ham radio, vs. the narrowly defined experiences possible as a novice or Technician or Technician plus license holder. By experiencing a larger variety of operating modes and bands than those allowed the Novice and Technician class holder, the Explorer license holder would be able to achieve a much higher level of understanding, new interests and self motivation to go farther in the hobby. The tangible rewards would be certificates of achievement in various areas, meaningful personal value to the license held, and call sign and additional operating privileges for completion of the license requirements.

The Adventurer class license

The purpose is to allow the individual additional operating mode and band privileges in order to achieve experience and operating proficiency in all modes and all propagation conditions experienced in ham radio. The class could be compared to the General and Advanced class of license, wherein the holder accesses all modes and all bands, albeit not all frequencies on all bands. The tangible rewards would be certificates of achievement in various areas, meaningful value to the license held (since it stands for achievement, not Q&A test passing) and additional operational privileges for completion of the license requirements.

The Expert class license

This would represent the highest level of operating achievement and experience. It would invoke all bands, modes and frequencies as the Extra class license now presents. A person could not, as I have heard some Extra class holders' brag, "get an extra without ever touching a soldering iron." The requirements include both operating achievement and technical experience. The tangible rewards include certificates of achievement, preferential call signs, and full operating privileges.

Examinations and Procedures

The examination process would only cover those areas for which direct experience would be an issue of public safety and interference to other services or within the amateur service. The additional license requirements are all based upon completion of experience and operating elements. These other elements cannot be achieved through a Q & A book, as they require actual on-air operation and validation, and technical achievement only achievable through activities that are related to but not a part of direct on-air communication. It is the emphasis on EXPERIENCE, not ROTE knowledge that differentiates this license system from the current license system. Further, in order to accommodate some variation in interests and opportunity posed by personal ability, location, or other circumstances, the list of license requirements is much like a college degree program where there are mandatory areas and optional areas.

The list of achievements provided herein is not meant to be all inclusive nor exclusive. It is intended to be representative, and not either final nor prejudicial toward options which may be suggested by others who might comment on this proposal.

Examination and validation of the experiential portion of the license would follow the general VEC program in existence today. Individuals wanting to upgrade would present their proofs of achievement to a VEC, which would verify the achievement, and pass/fail grade the application. It would then follow the current procedures for grant and issuance of a license and call sign.

Recognizing that some individuals may have preference for different areas of concentration of their interests, or be limited by physical constraints, the license requirements should be balanced so that a higher license grade can be achieved through the reasonable attempts of the applicant. Further, sufficient time is allowed to compensate for individual lifestyle circumstances, and other real life concerns which can affect opportunity and ability to achieve, and yet still allow the realization of the goals of both National interest and individual interest.

For example, it would be unreasonable to require a person to operate on 160 meters, since many people cannot erect a suitable antenna because of urban living quarters but could operate the 3-cm band due to close proximity of other hams, whereas a rural resident who can operate on 160 meters could gain achievement and experience on this band, yet not be able to operate on the 3-cm band because of lack of nearby population. This is not to say that the urban person cannot operate 160, it would simply be more difficult, or require more than a reasonable attempt to do so. Likewise, the rural resident could operate 3 cm, by portable or mobile operation in a more populated area, but would it be reasonable for a person living in the outback of Alaska to do so?

Rather than be judgmental collectively as to what *specifically* is or is not reasonable, the individual would choose from the menu, those items that they feel they can achieve in a reasonable manner, as defined by the individual, and present the summary of achievements to meet the criteria to upgrade.

License Criteria

The purpose of graduated license classes is to insure public and private safety, compliance with the Commission's rules, and to some extent, differentiate between various levels of expertise, rewarding those with additional privileges for having gained additional expertise.

Since the goals of public and personal safety and compliance with rules and to not cause interference is applicable to any licensed operation, this goal can be met at the initial stage of license. Therefore it is proposed that a question pool, as currently used, be adopted which would have areas of topics which address the following:

Safety examples:

Electrical safety, harmful or lethal aspects of electricity, safety procedures, interlocks, discharge of power supplies, disconnection of devices, harmful or lethal aspects of RF and Microwave energy (non ionizing radiation) standards of exposure, harmful or lethal aspects of antennas and erection, controlled and uncontrolled environments, hazards of portable, mobile operation. Interference to other devices (pacemakers) and other areas as may be suggested.

Compliance examples:

Frequencies allocated and allowed, modes of transmission, technical consideration of modulation in various modes, (spurs, artifacts of over modulation/deviation) interference avoidance and other areas currently examined or as may be suggested by others. This is currently addressed by the question pool, but may need to be expanded in topical areas.

Operational examples:

Since some knowledge of operating practices and courtesy are necessary before operation, a question pool which covers this area is necessary. This is to avoid inadvertent interference with established communication patterns and conventions, and allow acclimation to and acceptance by current operators and operations. This is currently addressed in the question pools. This includes specific operating methods and techniques for CW, SSB, HF, VHF, packet, digital and visual modes, band plans and repeater operations of voice and non voice signals.

The remainder of the license criteria would be met by certificate of achievement in various areas. Since the initial license applicant cannot have prior experience, only the written portion of the exam would be required, as it is now for the Technician class license. The Adventurer and Expert class upgrades would only require proof of achievement in various areas, and a refresher course (review).

License Privileges:

The purpose of the proposed license class program is to encourage growth and experience in all areas of ham radio. Therefore, it follows that the license holder must have opportunity to achieve this experience in as broad a list of categories such that it will allow the person to attain the necessary knowledge and experience and personal achievement necessary to prepare them for the next higher level. To meet this goal the following list of privileges is proposed for each of the three classes of license. Achievement of proficiency in each area (and alternate areas discussed later) is the criteria used to gain a higher license.

Explorer Class License Privileges:

Call sign 2 x 3 or 3 x 3 or 3 x 4 format or distinctive prefix (ie WN, WNN, NAA, etc).

CW operation on subbands of 80, 40, 30, 15, 10 meters.

SSB operation on 25 KHz of 2 HF bands 40 and 15 meters or selected by commenters or the Commission)

SSB operation on subband of 13 cm, and all frequencies on 9 cm and above.

SSTV operation on 50 KHz of the 10 meter band and on VHF frequencies allowed (below)

FM voice operation on 2 meters above 146.00 MHz, all of 1 1/4 meters, 33cm and above 9cm

Video operation on 13 cm and 23 cm or above

Digital operations on subbands (packet, RTTY, etc) 6 meters on 1 1/4 meters, and 13 cm and above

Spread Spectrum operation on 13 cm and above.

May not be a repeater owner/operator/trustee. (may use a repeater, but not be a control operator)

May NOT be VE

This allows exposure to all general use modes, access to all propagation modes, and operating circumstances of HF, VHF, UHF and microwave.

License term: 10 years, renewable once for an additional 5 years. This provides a reasonable time for achievement of proficiency and experience to meet the criteria for the next class of license. (below) in a controlled environment, where interference potential is minimized, while allowing contact with higher class licenses on various bands and modes to gain knowledge from experience, yet restrictive enough to encourage a desire for more privileges.

Adventurer Class License Privileges

Having achieved experience in most areas this class license would allow full privileges in all bands and all modes except for those reserved for Expert class. It follows the general concepts of the current General and Advanced class license.

Modes: All currently permitted by General/Advanced class

Frequencies: All currently permitted by General/Advanced class

May build/operate/trustee repeaters.

May serve as VEC

Call sign pool: same as current Advanced class.

License term: 20 years, renewal once for additional 20 years.

[Note: Petitioner is not opposed to lifetime or other term periods. However, 40 years should be more than enough to cover the "life span" of interest or achieve the criteria for the next higher (Expert) license class. It is the goal to have all hams at the "Expert" level after a reasonable time period. With 15 years at Explorer and 40 at Adventurer, this allows 55 years to achieve the highest level. Starting at age 10, by age 65 (a typical retirement age today) should be considered a reasonable time to meet the criteria. For those who simply have no desire to enrich themselves, we may decide to either continue to renew, or require advancement. This is an area sure to draw comments.]

Expert Class License Privileges

Modes: All
Frequencies All
May build/operate/trustee repeaters
May serve as VE
Call sign pool: same as current Extra
License term: life.

License Criteria

It is the goal of this proposed license system to encourage learning through experience. Therefore, the license criteria are based upon experience and achievement. Many possible alternatives are possible. This is presented as a guide or formulation of specific criteria of achievement.

Achievement can be demonstrated in several ways. Passing an exam is the traditional method used today, but this can be overcome by a simple rote memorizing of questions and responses. In order to encourage operating and life experience as tools for learning and development, the criteria for a license should be based upon DOING, rather than testing. There are a number of recognizable operating achievements today. These include certificates for WAS (Worked all states) DXCC (worked 100 countries) or for various contact multiples, ie certificates for having worked X number of stations in a particular mode or particular band. It is proposed that these certificates issued by bonafide amateur radio publications and organizations form the basis for the license upgrade criteria. Since there are numerous areas of interest and opportunity, it is proposed that all the applicable operating awards be seen as a pool. Achievement of a certain combination or "points" assigned to each certificate would constitute proof of operating proficiency. In addition, "points" could be awarded for certain ham related activities, which prove knowledge, or exposure to information. These additional areas include such activities as having a technical article published, writing a computer program, building/publishing equipment, operating during specific events such as Field Day, or VHF contests (log submissions). participating in public demonstrations using portable/mobile equipment CW speed and accuracy certificates, participation in public service, attendance and completion of various ham classes as may be established by VEC or other educational enterprises and other criteria as may be established.

The criteria for each license are to be based upon a point system. Passage of an exam, may be a part of the overall point pool, and could be a substitute for some but not most of the experience criteria.

Criteria Pool

The following is a list of EXAMPLES, and is not to be considered all inclusive or exclusive. Nor should this list be considered an endorsement or absence from this list be considered a lack of endorsement of any organization, publication or group. These were chosen to simply be widely recognized examples, or ICONS of the type of achievements to be considered in this proposed license system.

Explorer Class License Criteria

Passing with a grade of 70 or more, an exam of 100 questions, covering all aspects of ham radio currently covered by the Novice and Technician question pools, with 10 questions in each of the following required areas:

public safety,)	
personal safety,)	
antenna safety,)	
RF safety,)	(1 point for each correct answer...1 to
100)		
interference,)	
regulations,)	
VHF operating)	
HF operating)	
FCC regulations)	
general electronic knowledge)	

Subscription to at least two ham radio magazines,) (5 points)
one of general interest and one of specialized interest.)

Achievement of 70 or more points is a passing grade.

Verification by VE: correct answers of the exam questions. Subscription label from publications.

[Note how this confers that the person will gain knowledge from reading about ham activity/construction, etc, as a substitute for a small portion of the necessary exam points. Thus the license holder is exposed to educational material on an immediate and continuing basis (a magazine subscription) and allows for credit for this exposure *IN PART* towards successfully meeting the criteria (70 points) to obtain the license. This also places some *emphasis* on class room or learned rote Q&A and some emphasis on LEARNED EXPERIENCE which meets the stated goals.

Renewal Criteria: Achievement of 70% or more of the next license class.

This is to insure that some earnest effort is made towards a higher class license, but that effort may have been limited by personal circumstance, too varied to be considered individually (ie military service, family obligations, illness, etc). Presentation of any combination of criteria to achieve 70% of the passing criteria (70% of 70%) (roughly 50% of the next levels "exam" would be prima facie evidence that effort had been made and an extension would be reasonable. The time period selected (10 years) should be considered reasonable considering that this represents the same as current license periods.

Adventurer Class License Criteria

The entry level license proposed allows experience to be gained in all major areas of ham radio and operating experience in nearly all modes of modulation and under all major propagation methods. Thus, experience gained in these areas is the criteria for advancement. It is therefore proposed that the following pool of criteria be used to achieve the next level of license and privileges. Again, I wish to emphasize that the criteria listed are recognizable ICONS, and is not an endorsement of nor a prejudice for or against any organization or publication.

HF Operation:

Possible criteria and possible verification method by VE Verification methods are not repeated to avoid redundancy.

20 points for any of the following: (minimum 2 - - 40 points)

Proof of 2000 contacts on a minimum of 6 HF bands using a minimum of CW, SSB and a third mode. (QSL's)

Holder of WAS Certificate

Holder of DXCC certificate

Holder of WAZ certificate

Placed among top 100 in major HF contest (sponsor's published list)

Operated Field Day with more than 500 contacts (QSL's)

Operated portable or mobile with 100 or more verified contacts (QSL's)

Holder of other recognized HF certificate of achievement equivalent to above

VHF/UHF/MICROWAVE Operation

20 points for any of the following: (minimum 2 -- 40 points)

Proof of 2000 contacts on at least 4 bands above 50 MHz. using a minimum of four modulation modes.

Worked 30 or more states on VHF or above

Worked 30 or more countries on VHF or above

Placed among top 100 in major VHF and above contest

Operated Field Day with more than 250 contacts on VHF and above

Operated portable or mobile with 100 or more verified contacts

Holder of other recognized VHF and above certificate equivalent to above

Operating Proficiency

10 points

CW speed in excess of 20 WPM

10 points

More than 200 countries worked using not less than 4 HF and 1 VHF bands

10 Points:

Publication of operating article in any recognized ham publication

10 points

Publication of a technical article (computer program) in any recognized ham publication

10 points

Publication of a build-it project in any recognized ham publication

10 points

Any recognized certificate of operating proficiency

General Experience and Knowledge Criteria:

Modes: Proof of operation in each of the following modes:

20 points

each 25 or more verifiable contacts in each mode (5 points per mode, minimum 4 modes)

OSCAR

ATV

PACKET or other digital mode

RTTY (FSK/AFSK)

SSTV

FAX

VHF DX greater than 250 miles, (any mode no repeater operation) (50-1000 Mhz)

VHF DX greater than 100 miles (any mode, no repeater operation) (above 1000 MHz)

5 points

Subscription to two or more general interest and two or more special interest ham radio publications (publications may be foreign or domestic) for 2 or more years each (continuing education).

5 points

Instructor of a ham radio class, more than 25 total sessions. (club newsletter, copy of signature on VE exams)

5 points

Featured in a public service story in any recognized publication (as the person doing the public service)

5 points

Regular participation in Sky Warn or similar activity (letter from net control)

5 points

Regular participation in ham club activities (officer, director, committee person) (club newsletter)

5 points

Attendance at 25 or more hamfests or 20 or more ARRL state or national conventions. (ticket stubs)

5 Points

Certified VE.

2 Points

Repeater trustee (holder of repeater license)

5 Points

Attendance and completion of a ham radio safety refresher course.

10 points

Staff member or office holder in a national ham radio publication or organization

Passing criteria: Minimums:

40 points HF

40 points VHF

30 Points Operating Proficiency

40 points General knowledge and experience.

Expert Class License Criteria

This license class represents the highest standard of ham radio operator. The person holding this should be knowledgeable of nearly all areas of ham radio, and be recognized as a leader

HF Operation:

Possible criteria and possible verification method by VE Verification methods are not repeated to avoid redundancy.

20 points for any of the following: (minimum 5)

Proof of 2000 contacts on a minimum of 6 HF bands using a minimum of CW, SSB and a third mode. (QSL's)

Holder of WAS Certificate

Holder of DXCC certificate

Holder of WAZ certificate

Placed among top 100 in major HF contest (sponsor's published list)

Operated Field Day with more than 500 contacts (QSL's)

Operated portable or mobile with 100 or more verified contacts (QSL's)

Holder of other recognized HF certificate of achievement equivalent to above

VHF/UHF/MICROWAVE Operation

20 points for any of the following: (minimum 5)

Proof of 2000 contacts on at least 4 bands above 50 MHz. using a minimum of four modulation modes.

Worked 30 or more states on VHF or above

Worked 30 or more countries on VHF or above

Placed among top 100 in major VHF and above contest

Operated Field Day with more than 250 contacts on VHF and above

Operated portable or mobile with 100 or more verified contacts

Holder of other recognized VHF and above certificate equivalent to above

Operating Proficiency (minimum 4)

10 points

CW speed in excess of 30 WPM

10 points

More than 200 countries worked using not less than 4 HF and 1 VHF bands

10 Points:

Publication of operating article in any recognized ham publication

10 points

Publication of a technical article (may be a computer program) in any recognized ham publication

10 points

Publication of a build-it project in any recognized ham publication

10 points

Any recognized certificate of significant operating proficiency (ie DXCC honor role, top 25 in a major HF or VHF contest))

General Experience and Knowledge Criteria:

Modes: Proof of operation in each of the following modes:

30 points each 100 or more verifiable contacts in each mode
(5 points per mode, minimum 6 modes)

OSCAR

ATV

PACKET or other digital mode

RTTY (FSK/AFSK)

SSTV

FAX

VHF DX greater than 250 miles, (any mode no repeater operation) (50-1000 Mhz)

VHF DX greater than 100 miles (any mode, no repeater operation) (above 1000 MHz)

Extended areas: (Minimum 45 points)

5 points

Subscription to two or more general interest and two or more special interest ham radio publications (publications may be foreign or domestic) for 5 or more years each.

15 points

Instructor of a ham radio class, more than 25 total sessions. (club newsletter, copy of signature on VE exams)

5 points

Featured in a public service story in any recognized publication (as the person doing the public service)

5 points

Regular participation in Sky Warn or similar activity (letter from net control)

5 points

Regular participation in ham club activities (officer, director, committee person) (club newsletter)

5 points

Attendance at 50 or more hamfests or 25 or more ARRL state or national conventions. (ticket stubs)

15 Points

Certified VE.

5 Points

Attendance and completion of a ham radio safety refresher course.

10 points

Regular instruction of a ham radio safety course

10 points

Editorial Staff member or office holder in a national ham radio publication or organization

5 points

Editor for 1 year or more, club newsletter or special interest newsletter

5 points

Club or national officer or official 1 or more years

Passing criteria

- HF 100 points
- VHF 100 points
- Operating Proficiency 40 points
- General experience and knowledge 30 points
- Extended areas 45 points

VE role

To eliminate any administrative load to the Commission, the license application would follow the current VE system. Applicants license application certificates (proof of experience) would be examined by the local VE committee. In the event of a dispute over the value or validity, the VE decision would be arbitrated by the sponsoring VE organization. Guidelines listing the multitude of certificates available as "recognized" would be generated by the sponsoring VE groups, who would agree to not exclude or include certificates on the basis of issuing organizations to which they are affiliated which are not so recognized by the other sponsoring VE groups. [For example purposes only: a certificate by the ARRL which is recognized by ARRL for license purposes, could not be rejected by others, likewise certificates recognized by other VE sponsors could not be rejected by ARRL VE's.]

Any non certificate sponsor may make a application to a sponsoring VE group to be recognized, or it may be presented by the applicant for consideration by the VE's.

Verification of operational criteria through the use of QSL cards or letters confirming contacts, shall be limited to the existence and possession of the QSL card. Published lists of contest participants and their scores shall be verification of such criteria. Other publications may be used to verify other criteria, such as class attendance logs, ticket stubs bearing name and call letters and an attendance stamp from the sponsoring group, much as is used by professional organizations to verify participation and attendance for professional certification.

Any dispute not so resolved would be presented to the FCC for final resolution as a simple ALJ administrative matter.

Again keep in mind that the criteria listed here are not all inclusive nor meant to serve as anything more than to illustrate how the license system would be based upon experience and achievement, rather than simple test memorization.

SPECIFIC RULES CHANGES REQUESTED:

The specific rules changes to implement the proposed license system are as follows:

1. There shall be a grandfathering and continuation of all present license holders of all privileges and licenses currently held, until such time as the licensee expires, upgrades to a new license grade of the new series, or the license is otherwise expired, terminated or revoked.
2. There shall be as of the effective date of these rules, three classes of license for the Amateur Radio Service.
The classes of license shall be: Explorer, Adventurer, Expert.
3. The VEC sponsoring shall select and establish exam and certification criteria, based upon the concept of learned knowledge and operating experience. Such selection criteria shall be made without regard to the sponsoring organization established certification processes.

The license criteria for the Explorer class license shall be:

Passing with a grade of 70 or more, an exam of 100 questions, covering all aspects of ham radio currently covered by the Novice and Technician question pools, with 10 questions in each of the following required areas:

public safety,)	
personal safety,)	
antenna safety,)	
RF safety,)	(1 point for each correct answer)
interference,)	
regulations,)	
VHF operating)	
HF operating)	
FCC regulations)	
general electronic knowledge)	

Subscription to at least two ham radio magazines,) (5 points)
one of general interest and one of specialized interest.)

Achievement of 70 or more points is a passing grade.

The license criteria for the Adventurer class license shall be:

The accumulation of points necessary to achieve the proof of experience necessary to insure understanding of HF, VHF, general electronic knowledge of safety, HF and VHF operation, and the technical parameters of the various modulation modes permitted to the Amateur Radio Service, to allow operation without undue risk to public or personal safety and unreasonable interference to other users and modes. The VEC Sponsoring organizations will select, define and decide those criteria necessary to meet this goal.

The license criteria for the Expert class license shall be:

The accumulation of points necessary to achieve the proof of experience necessary to insure understanding of all propagation modes, all rules, regulations and operating criteria, all modulation technical consideration, and continued sponsorship of education of lesser licensees and public safety and service.

The Commission will adopt as specific rules, those certifications, and proofs, selected by the VEC's which meet the goals and criteria for each license class.

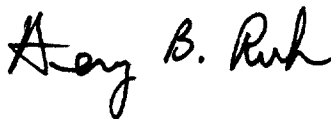
In addition, the FCC will institute the licensing of all existing repeater stations with a distinctive call sign to insure that such repeaters are sponsored, built and operated by the appropriate class licensee.

No new licenses will be granted of the classes: novice, technician, general, advanced, or extra, after the new license system begins. Each such class of license shall expire completely when the last valid license currently held expires, including such renewals as may be granted for the existing license holder.

Other changes as necessary for the adoption of the new system of license.

The license class names were also chosen for appeal, and to be descriptive of the privileges allowed. Explorer certainly sounds more impressive than novice or code-free-technician, and simply points to the license holder being allowed to explore ham radio in many areas. Likewise Adventurer was chosen as the privileges allow many adventures in ham radio, and it sounds better than general or advanced. Likewise Expert is more descriptive than Extra, and denotes an air of superior knowledge and experience, thus an expert.

Respectfully Submitted

A handwritten signature in cursive script, reading "Henry B. Ruh".

Henry B. Ruh, KB9FO
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